

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF VERMONT**

In re:

Hermitage Inn Real Estate Holding  
Company, LLC  
Debtor

Chapter 11

Involuntary Case No.: 19-10214 (CAB)

**NOTICE OF JOINDER IN OPPOSITION TO THE DEBTOR'S SECOND AMENDED MOTION  
FOR ORDER AUTHORIZING POST-PETITION FINANCING AND GRANTING SUPER-  
PRIORITY LIENS**

Cold Brook Fire District No. 1 ("CBFD") and through its attorneys, Pratt Vreeland Kennelly Martin & White, Ltd., hereby file its Notice of Joinder.

- (i) In Opposition to the Debtor's Second Amended Motion for Order Authorizing Post-Petition Financing and Granting Super-Priority Liens, as filed by the U.S. Trustees' Office, Barnstormer, the Ad Hoc Committee, and Berkshire Bank.

CBFD is a municipal entity and a party to executory contracts with the Debtor concerning the provision of water and sewage disposal services. The Berkshire Bank has been paying the amounts due CBFD under the agreements with the Debtor that came due since the Bank filed the foreclosure action. There is no mention of these executory contracts in the Debtor's schedules.

The Debtor is not a going concern nor an operating business and there is little likelihood that the Debtor can propose a feasible plan that doesn't involve an immediate sale.

Accordingly, CBFD requests that the Motions be denied.

DATED at Rutland, Vermont this 11th day of July, 2019.

Cold Brook Fire District No. 1  
by its counsel,

By: /s/ John J. Kennelly

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